

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Case No. 16-10250
)	
DEAN MAYNARD BOLAND,)	Chapter 7
)	
Debtor.)	Judge Jessica Price Smith
<hr/>)	
)	
JOHN W. FORREST,)	
)	
Movant,)	
)	
vs.)	
)	
DEAN MAYNARD BOLAND,)	
)	
Respondent.)	
)	

**NOTICE OF MOTION OF JOHN W. FORREST
FOR RELIEF FROM STAY**

PLEASE TAKE NOTICE that John W. Forrest (“Movant”), by and through his undersigned attorney, has filed a motion (the “Motion”), pursuant to Section 362 of the Bankruptcy Code and Bankruptcy Rules 4001 and 9014, for an Order conditioning, modifying or dissolving the automatic stay imposed by Section 362 of the Bankruptcy Code to the extent necessary to permit Movant to prosecute litigation pending in the Second Judicial Circuit, Jefferson County, Florida, Case No. 14-000150-CA for the limited purpose of removing Debtor from his position as Trustee of certain Trusts.

Your rights may be affected. You should read the Motion carefully and discuss it with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief sought in the Motion, then on or before

March 25, 2016 (the "Response Deadline"), you or your attorney must file a response using the Court's ECF System.

The Court must **receive** your response on or before the Response Deadline. You must also send a copy of your response either by the Court's ECF System or regular U.S. Mail to:

Dov Y. Frankel
Taft Stettinius & Hollister LLP
200 Public Square, Suite 3500
Cleveland, Ohio 44114

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in Motion and may enter orders granting such relief without further hearing or notice.

If necessary, a hearing on the Motion shall be held on **April 12, 2016 at 10:30 a.m.** (EST) in the United States Bankruptcy Court for the Northern District of Ohio, Howard M. Metzenbaum U.S. Courthouse, 201 Superior Avenue, Cleveland, Ohio 44114-1235.

Dated: March 7, 2016

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

/s/ W. Dov Y. Frankel
Dov Y. Frankel (0077562)
200 Public Square, Suite 3500
Cleveland, Ohio 44114
Telephone: (216) 241-2838
Facsimile: (216) 241-3707
dfrankel@taftlaw.com

ATTORNEYS FOR MOVANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Notice of Motion for Relief from the Automatic Stay* was served this 7th day of March, 2016:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Stephen D. Hobt, on behalf of the Debtor, at shobt@aol.com
- Richard A. Baumgart, Chapter 7 Trustee, at baumgart_trustee@dsb-law.com
- Sheldon Stein, on behalf of Victoria Bloom and Peter Lora, at ssteindocs@gmail.com
- United States Trustee (Registered address)@usdoj.gov

and was served upon the following person by First Class U.S. mail, postage pre-paid

Dean Maynard Boland
1440 Lewis Drive
Lakewood, OH 44107

/s/ Dov Y. Frankel